

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF INDIANA, INDIANAPOLIS DIVISION**

LEON BENSON and KOLLEEN)	
BUNCH,)	
Plaintiffs,)	Case No. 1: 24-CV-00839 JPH-MJD
v.)	Honorable Judge James Patrick Hanlon
)	Hon. Magistrate Judge Mark J. Dinsmore
CITY OF INDIANAPOLIS, ALAN F.)	
JONES, LESLIE VANBUSKIRK,)	
STEVEN GARNER, ELI)	
MCALLISTER, and COLUMBUS)	
RICKS, in their individual capacities,)	
Defendants.)	JURY TRIAL DEMANDED

**DEFENDANT ALAN JONES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER**

Defendant Alan F. Jones, by and through his attorneys, The Sotos Law Firm, P.C., hereby moves for a 14-day extension of time to file his Reply In Support of His Motion for Protective Order.

1. On October 20, 2025, Jones filed his Motion for Protective Order. (Dkt. 141.)
2. On November 3, 2025, Plaintiffs moved for a 14-day extension of time to respond to this motion, (Dkt. 152), which request the Court granted the following day. (Dkt. 156.)
3. Pursuant to that extension, Plaintiffs filed their Response on November 17, 2025. (Dkt. 162.) By rule, Jones has 7 days (until November 24) to respond. S.D. Ind. L. R. 7-1(c)(3)(B).
4. The Response is extensive. Across 18 pages, Plaintiffs not only respond to the gravamen of Jones' arguments, but also lodge personal ad hominem attacks against defense counsel and make new requests unrelated to the relief sought in Jones' motion.
5. Thus, Jones' Reply has become uniquely important, given the sheer volume of new issues raised by Plaintiffs. Defense counsel thus expect that drafting this Reply, and undertaking both the factual and legal research it demands, is likely to become an exceptionally time-consuming endeavor.

6. Yet lead counsel for Jones is currently amidst an exceptionally demanding stretch of professional obligations. The Reply is presently due on Monday, November 24, yet this week alone, counsel has the following obligations: attendance at a deposition in a state court proceeding in *Jackson v. City of Rockford*, Circuit Court of 17th Judicial Circuit, Winnebago County, Illinois, 2021-L-0000112 (Monday, 11/17); drafting, finalizing, and filing a comprehensive motion to dismiss First Amendment and federal civil rights claims in *Brodsky v. Palaro, et al.*, U.S. District Court, Northern District of Illinois, 25-cv-10436 (Tuesday, 11/18); a previously scheduled and confirmed out of town meeting in Rockford, Illinois with clients in *Mondragon v. City of Rockford, et al.*, Circuit Court of 17th Judicial Circuit, Winnebago County, Illinois, 2023-LA-000315 (Wednesday, 11/19); a court-approved deposition of incarcerated witness Ezell Neville in this instant matter that is required to be completed before 11/21 (see Dkt. 155) (Thursday, 11/20), and an all-day private and confidential mediation with a retired judge in an officer-involved shooting case at ADR in Chicago, Illinois (Friday, 11/21).

7. Finally, lead counsel will be out of the state in Minnesota the following week with family for the Thanksgiving holiday, with plans to leave Tuesday (11/25) and return Sunday (11/30).

8. Thus, Jones respectfully requests 14 additional days to file his Reply.

9. Jones contacted Plaintiffs' counsel before filing this request; counsel indicated that Plaintiffs do not oppose this request.

CONCLUSION

WHEREFORE, Jones respectfully requests that the Court extend his deadline to file a Reply in support of his Motion for Protective Order by 14 days, until December 8, 2025.

Date: November 19, 2025

Respectfully submitted,

/s/ Jeffrey R. Kivetz

JEFFREY R. KIVETZ, Atty. No. 6308250
One of the Attorneys for Defendant Alan F.
Jones

James G. Sotos
Laura M. Ranum
Jeffrey R. Kivetz
Andrew Leuchtmann
THE SOTOS LAW FIRM, P.C.
141 W. Jackson Blvd, #1240A
Chicago, IL 60604
(630) 735-3300
jkivetz@jsotoslaw.com

CERTIFICATE OF SERVICE

I, Jeffrey R. Kivetz, certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, that on November 19, 2025, I electronically filed the foregoing **Defendant Alan Jones' Unopposed Motion for Extension of Time To File Reply In Support of Motion for Protective Order** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record on the below Service List.

Attorneys for Plaintiffs Benson and Bunch:

Elliot Slosar
Kathryn Montenegro
Amy Robinson Staples
LOEY & LOEY
311 North Aberdeen
3rd Floor
Chicago, IL 60607
312-243-5900
elliot@loevy.com
katiem@loevy.com
amy@loevy.com

Kiely C Keesler
City of Indianapolis Office of Corporation
Counsel
200 E Washington St
Ste 16011
Indianapolis, IN 46204
317-327-4055
kiely.keesler@indy.gov

/s/ Jeffrey R. Kivetz
Jeffrey R. Kivetz

Charlie Chaya Nelson Keever
Lara Abigail Bazelon
BNK LAW GROUP
201 Spear Street
Suite 1100
San Francisco, CA 94105
(415) 489-0469
cnelsonkeever@gmail.com
larabazelon@gmail.com

Attorneys for Defendants City of Indianapolis, Leslie Vanbuskirk, Steven Garner, Eli McAllister and Columbus Ricks:

Alexander Phillip Will
Anthony W. Overholt
Frost Brown Todd LLP
111 Monument Circle
P.O. Box 44961
Suite 4500
Indianapoilis, IN 46244-0961
317-237-3800
awill@fbtlaw.com
aoverholt@fbtlaw.com